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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION

## STIPULATION

18       Defendant and the government, through their respective counsel, subject to the court's  
19 approval, hereby stipulate that the Court continue the status hearing in the above-captioned  
20 matter, presently scheduled for September 20, 2012, at 9:00 a.m., to November 8, 2012, at  
21 9:00 a.m. The reason for the stipulation is as follows. Counsel for Mr. Tulud took an extended  
22 medical leave from July 25, 2012, until his return on August 27, 2012. Because of continuing  
23 health issues counsel is now working part time. Defense counsel has been working on preparing  
24 pretrial motions in the case of *United States vs. Luis Ruiz-Lopez*, case numbered CR-11-00749-  
25 LHK. The *Ruiz-Lopez*, *id.*, case is set to proceed to trial on September 21, 2012. The  
26 Government has provided the defense with discovery and in particular documents regarding the

Stipulation to Continue Status Hearing to November 8, 2012; [ ] Order

No. CR-12-00408 - DLJ (PSG)

1 loss amount. Defense counsel needs to have them analyzed. In addition, defense counsel needs  
2 to review said documents with his client and additional time to confer with his client and  
3 investigate his concerns. Lastly, counsel need additional time to negotiate a possible disposition  
4 of the matter.

5 The parties further agree and stipulate that time should be excluded from and including  
6 September 20, 2012, through and including November 8, 2012, to provide counsel reasonable  
7 time to prepare, pursuant to Speedy Trial Act, 18 U.S.C. §3161(h)(7)(A) and (B)(iv).  
8 Accordingly, the United States and the defendant agree that granting the requested exclusion of  
9 time will serve the interest of justice and outweigh the interest of the public and defendant in a  
10 speedy trial.

11 Dated: September 14, 2012

12 \_\_\_\_\_/s/  
13 MANUEL ARAUJO,  
Assistant Federal Public Defender

14 Dated: September 14, 2012

15 \_\_\_\_\_/s/  
16 MEREDITH J. EDWARDS,  
Assistant United States Attorney

17 **[ ] ORDER**

18 Good cause appearing and by stipulation of the parties, it is hereby ordered that the status  
19 conference hearing in the above-captioned matter is continued from September 20, 2012, at  
20 9:00 a.m., to November 8, 2012, at 9:00 a.m. It is further ordered that the period of delay from  
21 September 20, 2012, through and including November 8, 2012, be excluded for purposes of  
22 Speedy Trial Act computations pursuant to Title 18, United States Code, Sections 3161(h)(7)(A)  
23 and 3161(h)(7)(B)(iv).

24 DATED: \_\_\_\_\_

  
25 HONORABLE D. LOWELL JENSEN,  
United States District Judge